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10 Attorney for Defendant  
11 BRYAN PAUL TAMBLYN

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13  
14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA, ) Case No. 2:20-cr-00014-DJC  
17 Plaintiff, )  
18 vs. ) STIPULATION FOR TEMPORARY  
19 BRYAN PAUL TAMBLYN, ) MODIFICATION OF CONDITIONS OF  
20 Defendant. ) PRETRIAL RELEASE; ORDER  
21 ) Hon. Carolyn K. Delaney  
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19 The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record,  
20 Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its  
21 attorney of record, Christina McCall, hereby stipulate to and request an order from this Court  
22 temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to attend a  
23 family pizza and movie night at his mother's home in Sacramento, CA on Friday, September 1,  
24 2023 from 7:00 p.m. – 11:00 p.m.. The parties have conferred with Mr. Tamblyn's assigned  
pretrial services officer, who approves of this stipulated modification.

25 Mr. Tamblyn has been on pretrial release in this district since February 2020, on a  
26 \$50,000 unsecured appearance bond as well as an appearance bond secured by deeds of trust and  
27 co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26  
(unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust).

1 Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr.,  
2 Jerome Espinosa, and Sheri Placencia.

3 Mr. Tamblyn is in compliance with all of his conditions of release. One of those  
4 conditions of release is location monitoring. Mr. Tamblyn is subject to curfew, and therefore  
5 must remain inside his residence between the hours of 8:00 p.m. and 8:00 a.m. except for pre-  
6 approved employment; education; religious services; medical, substance abuse, or mental health  
7 treatment; attorney visits; court appearances; court ordered obligations; or other activities  
8 authorized by the pretrial services officer<sup>1</sup>.

9 Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of  
10 Release be temporarily amended to specifically permit him to attend the family gathering at his  
11 mother's home in Sacramento, CA, that is expected to conclude at 11:00 p.m. on Friday,  
12 September 1, 2023. The guests will include Mr. Tamblyn's parents, siblings, uncles and aunts,  
13 and his minor niece, who will be accompanied by her parents. The pretrial officer has advised  
14 that she has spoken to the minor's parents, who have confirmed their understanding of Mr.  
15 Tamblyn's case and pretrial release conditions.

16 Mr. Tamblyn's mother's home is (approximately) a 30-minute drive from Mr. Tamblyn's  
17 residence in Elk Grove, CA. Allowing some additional time for cleanup and traffic, the parties  
18 request a temporary modification of pretrial conditions to permit Mr. Tamblyn to return home by  
19 11:59 p.m. on Friday, September 1, 2023. Mr. Tamblyn will return directly to his residence at  
20 the conclusion of the gathering.

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27       <sup>1</sup> Pretrial services interprets this condition to only permit their approval of other activities which are deemed  
28       essential, with all other activities requiring the approval of the Court. The pretrial services officer who supervises  
Mr. Tamblyn advised defense counsel that this specific request should be submitted to the Court for approval, in the  
form of a stipulation by the parties.

1                   The proposed temporarily amended condition is attached to this request. The parties do  
2 not request a hearing in this matter in light of this stipulation.

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5                   DATED: August 29, 2023

Respectfully submitted,

HEATHER E. WILLIAMS

6                   Federal Defender

7                   /s/ Megan T. Hopkins  
8                   MEGAN T. HOPKINS  
9                   Assistant Federal Defender  
10                   Attorney for BRYAN PAUL TAMBLYN

11                   DATED: August 29, 2023

PHILLIP A. TALBERT  
United States Attorney

12                   /s/ Christina McCall  
13                   CHRISTINA MCCALL  
14                   Assistant United States Attorney  
15                   Attorney for the United States

## ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that he is permitted to attend a family gathering at his mother's home in Sacramento, CA and return to his residence no later than 11:59 p.m. on Friday, September 1, 2023. Mr. Tamblyn shall not be in the presence of any juveniles or minors unless that juvenile or minor's parent or guardian is also present. All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

Dated: August 29, 2023

Carolyn K. Delaney

CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE